UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

Civil Action No. 04-30014-MAP

THE MERCY HOSPITAL, INC.,)	
Plaintiff)	
)	
V.)	MOTION FOR EXTENSION OF TIME
)	FOR FILING OF SUMMARY
MASSACHUSETTS NURSES)	JUDGMENT MOTION AND BRIEF
ASSOCIATION,)	
Defendant)	

Now comes the plaintiff and moves for additional time to file its Motion for Summary Judgment and as grounds therefor states:

1. Counsel for the plaintiff was called for two consecutive trials in Hampden County Superior Court this week (Blankenship vs. Integrated Travel Solutions, Inc. and Hodge vs. Roman Catholic Bishop of Springfield) and the second trial was scheduled to commence today, June 10, 2004. Argument on motions began but have been delayed until Tuesday, June 15th, at which time the trial could recommence. The brief is presently scheduled to be due on June 15th. Counsel also has a vacation scheduled between June 21 and June 26 and, therefore, requests an extension of time until June 30, 2004, to file his motion.

THE PLAINTIFF BY ITS ATTORNEY

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served this 10th day of June, 2004, on all parties, by First Class Mail, postage prepaid, to:

Mark A. Hickernell, Esquire McDonald & Associates Cordaville Office Center 153 Cordaville Road, Suite 210 Southborough, MA 01772

Maurice M. Cahillane

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